

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS

ANANDA CAMARGO CHAVEZ,
Plaintiff,

v.

REBUILT BROKERAGE LLC d/b/a
REBUILT REALTY AND REBUILT
OFFERS LLC
Defendants.

§
§
§
§
§
§
§
§

Case No. 1:24-cv-504-RP

DECLARATION OF ANANDA CAMARGO CHAVEZ

1. My name is Ananda Camargo Chavez. I am over 18 years old. I can testify competently to the undersigned statements.
2. This declaration is based on my personal knowledge.
3. My telephone number 210-XXX-XXXX is on the National Do-Not-Call Registry and has been for at least 31 days since I began receiving the text messages at issue from the Defendants.
4. I am the user of 210-XXX-XXXX.
5. I am the owner of 210-XXX-XXXX.
6. This number is used for personal, household purposes.
7. I never provided my consent to Defendants to make calls or send text messages to the 210-XXX-XXXX number in any manner, including through a website.
8. To be clear, I do nothing to precipitate the illegal calls or text messages which are placed to me. I do not want these communications, but they continue to be placed to me. They are highly annoying and disruptive.

9. I understand that this lawsuit alleges that the Defendants violated the Telephone Consumer Protection Act by sending text messages to my telephone number without obtaining proper consent.

10. I understand that this is a proposed class action and that I am a proposed class representative.

11. I understand that a class action is a lawsuit brought by at least one person on behalf of a group of people who have been treated in the same or essentially the same illegal manner by the Defendants.

12. I am willing to be a representative of the class.

13. To my knowledge, I have no interests inconsistent with those of the class members. I believe my interests are entirely consistent with the class members' interests because I seek to remedy Defendants' violations of the Telephone Consumer Protection Act, which have harmed other proposed class members in the same way.

14. I understand that as a class representative I have the responsibility to: a) continue to consider the class's interests when making any decisions about the case and make all such decisions in the interests of the class, not just my own interests; b) to participate in the case and consult with my counsel about the case; c) and that I have testified at a deposition, may need to testify at trial and have and continue to provide documents and information for use in the case.

15. I have stayed in contact with my counsel about the case and responded to written discovery requests when they requested them of me, was deposed, and am willing to appear to testify at trial in this matter.

16. I have arranged for my counsel to advance all costs of this action, including the costs of any notification to the class.

17. My number is on the Do-Not-Call Registry, and I did not provide any consent for anyone to send these messages to me.

18. I understand that courts have sometimes awarded people money for serving as the class representative, but that I am not entitled to any such payment, and I have not been promised or guaranteed money for being the class representative.

19. I brought this case not for personal motives or financial gain, but as a bulwark for the rights of consumers against illegal telemarketing. I was not paid by anyone to do so.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 20th day of March, 2025


Ananda Camargo Chavez (Mar 20, 2025 17:00 CDT)

Ananda Camargo Chavez